

REMARKS

Claims 1, 10, 13, and 15 have been amended. Claims 1-15 and 19-21 remain pending in the above-referenced application. No new matter has been added. It is respectfully submitted that, based on the above amendments and the following remarks, all of the presently pending claims are in condition for allowance.

Claims 1-6 and 14 stand rejected under 35 U.S.C. § 103(a) as unpatentable over United States Patent No. 5,216,612 to Cornett et al. ("Cornett") in view of United States Patent No. 6,681,990 to Vogler et al. ("Vogler") and United States Patent No. 5,884,300 to Brockman ("Brockman"). Applicants have amended claims 1, 10, 13, and 15 to recite that plurality of inventory models comprise "default configuration data for telecommunications equipment in a central office in a telecommunications network." Support for this amendment is found at least in paragraph [0037] of the specification (reference is to the published version). In the rejection, the Examiner admits that neither Cornett nor Vogler teaches the default configuration data as written prior to the current amendment, and that it is taught by Brockman. Applicants disagree that Brockman meets this limitation as amended. The Examiner relies on Figure 7, column 3, lines 25-54, and column 6, lines 15-28 of Brockman.

Column 3, lines 25-54, reads as follows:

If, at step S445, the production/inventory management unit 320 determines that products are in inventory, a signal is sent to the logistics/transportation section 345 to have the products picked from the consignment warehouse 350 and a "merge" along the product route from the factory 335 to the field office/local distribution center 355 is arranged, if necessary. At step S450, required products are picked from inventory and sent to the appropriate field office/local distribution center 355.

The inventory pipeline management system 100 can collect up-to-date inventory data on a frequent basis, e.g., daily, and automatically determine if inventory levels for products at each field office/local distribution center 355 are in accordance with the inventory model. Therefore, the inventory pipeline management system 100 supports a "build today which was consumed yesterday" approach to inventory management. That is, the inventory pipeline management system 100 determines current product requirements based on the previous day's inventory activity/product consumption.

In addition, the inventory model can be updated on a frequent basis to account for changes in desired inventory levels for individual products and/or field

office/local distribution centers 355. The inventory model can be automatically updated using data collected from each field office/local distribution center 355 and the logistics/transportation section 345, as more fully described below in FIG. 3, or manually by managers after reviewing the validation and discrepancy reports.

Column 6, lines 15-28, reads as follows:

FIG. 7 shows a computer system on which the inventory pipeline management system 100 may be configured to operate. In this example, the inventory model unit 305, differential calculation unit 310, the value validation and discrepancy reporting unit 315, and production/inventory management unit 320 are implemented as software modules in a general purpose computer 905. The data collection unit 325 is implemented as a software module in a general purpose computer 915. Data from field offices/local distribution centers 355 is output to the general purpose computer 915 by general purpose computers 910, 920, 925, 935 located at each field office/local distribution center 355. The logistics/transportation section 345 outputs data to general purpose computer 915 through the general purpose computer 930.

Neither of these passages has any logical connection to “configuration data for telecommunications equipment,” as recited in the amended claims. The first passage is concerned with the system (1) determining that certain products are present in inventory and (2) arranging for the products to be picked from the consignment warehouse 350. It also relates to inventory values that signify the amount of inventory at a particular distribution center. The passage does not deal with configuration data for equipment because no signal in this passage is described as capable of altering or affecting the way that the inventoried products operate. It is not as if, for instance, Brockman generates a signal indicating that a piece of equipment in inventory is to be cabled according to arrangement A as opposed to arrangement B once the equipment is delivered to and implemented by its intended user.

The second passage also lacks a logical relationship to the recited configuration data. This passage merely describes how certain functions can be implemented as software modules, and how data from the distribution centers are supplied to the general purpose computer that executes these modules. There is nothing in this passage that pertains to “updated inventory data comprising specific operating parameters for the inventoried equipment in the inventory management system” as recited in the claims. In Brockman, the information transmitted

between the central, general purpose computer 905 and the computers at the various remote locations have no relevance to any “specific operating parameters for [] inventoried equipment” as further recited in the claims. These signals in the Brockman system pertain primarily to counting what products are inventoried at the various remote locations. Therefore, withdrawal of this rejection is requested.

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CONCLUSION

In light of the foregoing, Applicants respectfully submit that all of the pending claims are in condition for allowance. All issues raised by the Examiner having been addressed, an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

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